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10
11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13 OAKLAND DIVISION
14

15 **BRANDEE TRIPP,**

Petitioner,

17 v.

18 **DAWN DAVISON, Warden,**

19 Respondent.

No. C 07-05748 CW

**RESPONDENT'S UNOPPOSED
REQUEST FOR AN EXTENSION
OF TIME; SUPPORTING
DECLARATION OF COUNSEL**

20
21 **REQUEST FOR AN EXTENSION OF TIME**

22 Respondent Dawn Davison, Warden at the California Institution for Women, requests
23 that this Court, for the reasons set forth in the accompanying declaration of counsel, grant an
24 extension of time to, and including, June 23, 2008, to file an answer.

25 **DECLARATION OF COUNSEL**

26 I, Denise A. Yates, declare:

27 1. I am an attorney admitted to practice before the courts of the State of California
28 and in this Court. I am employed by the California Attorney General's Office as a Deputy

1 Attorney General in the Correctional Writs and Appeals Section. I am assigned to represent
2 Respondent in this case in which Petitioner Tripp challenges her 2004 parole denial.

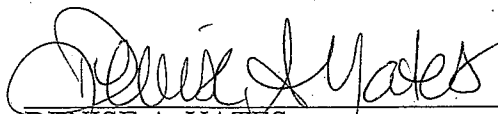
3 2. Pursuant to this Court's May 9, 2008 Order, Respondent's answer is due June 9,
4 2008.

5 3. I need additional time to prepare a response in this case because since May 9,
6 2008, I have prepared approximately four substantive filings and presented one oral argument. In
7 addition, in the next five weeks, I am scheduled to prepare approximately fifteen substantive
8 filings, and I will be out of the office for at least thirteen days. Accordingly, Respondent
9 respectfully requests additional time to file an answer.

10 4. This request for an extension of time is not made for any purpose of harassment,
11 undue delay, or for any improper reason. Petitioner Tripp should not be prejudiced by this
12 request for an extension of time. Respondent has not requested any other extensions of time to
13 file an answer following this Court's May 9, 2008 Order. Today I left a message for Tripp's
14 attorney, Adrian Woodward, about this extension request, and his office stated that he is not
15 opposed to an extension until June 23, 2008.

16 5. Without an extension of time, Respondent would be substantially harmed or
17 prejudiced in that I would not be able to prepare a proper and thorough answer.

18 I declare under penalty of perjury that the foregoing is true and correct and that this
19 declaration was executed on May 21, 2008, at San Francisco, California.

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21 
22 DENISE A. YATES
23 Deputy Attorney General
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DECLARATION OF SERVICE BY U.S. MAIL

Case Name: **In re BRANDEE TRIPP**

No.: **07-05748 CW**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On **May 22, 2008**, I served the attached

**RESPONDENT'S UNOPPOSED REQUEST FOR AN EXTENSION OF TIME ;
SUPPORTING DECLARATION OF COUNSEL**

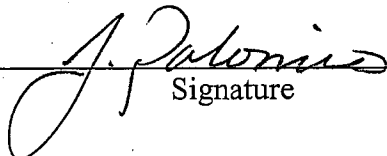
PROPOSED ORDER

by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General at 455 Golden Gate Avenue, Suite 11000, San Francisco, CA 94102-7004, addressed as follows:

Adrian T. Woodward, Esq.
Law Offices of Adrian T. Woodward
4266 Atlantic Avenue
Long Beach, CA 90807
attorney for Brandee Tripp

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on **May 22, 2008**, at San Francisco, California.

J. Palomino
Declarant


Signature